

GIBSON DUNN

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June 22, 2016

VIA ECF

The Honorable Paul A. Engelmayer
United States District Court Judge
United States District Court for the Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: Vasto v. Credico (USA) LLC, et al., Case No. 15-cv-9298 (PAE)(HBP) [rel. 15-cv-5237]

Dear Judge Engelmayer:

Our firm was recently engaged to represent Credico (USA) LLC ("Credico") and Jesse Young in the above-captioned action, and we just replaced their former counsel of record today, pursuant to the Court's Order (Dkt No. 129).

Given our recent engagement in this matter, we respectfully request that our clients and all parties to this action receive a fourteen-day extension of time in which to complete and exchange initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1). The original deadline of June 24, 2016 was set on June 10, 2016 by the Civil Case Management Plan and Scheduling Order (Dkt. No. 124), pursuant to which deadlines may be extended "for good cause shown." The new deadline for all parties would be July 8, 2016, which will provide us with sufficient time to coordinate with our clients and obtain the necessary information to fully complete the disclosures. This extension will not affect any other deadlines in this action. Counsel for all parties have consented to this extension request and asked that we request that their disclosure deadline be extended by the same period, as noted above. This is Credico's and Mr. Young's first request for an extension of this deadline.

Respectfully,

/s/ Jennifer H. Rearden

Granted.

Jennifer H. Rearden

6/22/16

cc: All counsel of record (via ECF)

SO ORDERED:

Paul A. Engelmayer

HON. PAUL A. ENGELMAYER
UNITED STATES DISTRICT JUDGE